

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:18-CV-68
)	
UNITED STATES OF AMERICA, <i>et al.</i> ,)	
)	
Defendants,)	
)	
KARLA PEREZ, <i>et al.</i> ,)	
)	
Defendant-Intervenors,)	
and)	
)	
STATE OF NEW JERSEY,)	
)	
Proposed Defendant-Intervenor.)	

UNOPPOSED MOTION TO APPEAR ON BEHALF OF THE ATTORNEY-IN-CHARGE

In the event that the Court denies Defendant-Intervenors' Motion To Continue Hearing Set For December 22, 2020 Or To Hear Argument Remotely, Dkt. 538, pursuant to this Court's Civil Procedures, Rule 5, Defendant-Intervenor State of New Jersey (New Jersey) moves to substitute Jeremy M. Feigenbaum, State Solicitor, admitted pro hac vice on November 24, 2020, Dkt. 531, for attorney-in-charge Mayur P. Saxena at the Motion Hearing in this matter scheduled for December 22, 2020, Dkt. 506.

Attorney-in-charge Saxena is unable to travel to Texas for the Motion Hearing for health reasons, and State Solicitor Feigenbaum is familiar with the case and has full authority to bind New Jersey.

This motion will not cause undue delay and will not adversely affect the interests of New Jersey. The motion is unopposed.

For these reasons, New Jersey respectfully requests that the Court grant this Motion.

Dated: December 15, 2020

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Mayur P. Saxena
MAYUR P. SAXENA
Attorney-in-Charge
Assistant Attorney General
(admitted pro hac vice)
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CERTIFICATE OF SERVICE

I certify that on December 15, 2020, I caused this document (and exhibits hereto) to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Mayur P. Saxena
Mayur P. Saxena

CERTIFICATE OF CONFERENCE

I certify that on December 3, 2020, I emailed Todd Disher, counsel for Plaintiffs, Nina Perales, counsel for Perez Defendant-Intervenors, and Jeffrey Robins, counsel for Federal Defendants to confer on the motion to substitute counsel. All counsel consent to this request.

/s/ Mayur P. Saxena
Mayur P. Saxena

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STATE OF NEW JERSEY,)	
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Proposed Defendant-Intervenor.)	

[PROPOSED] ORDER

Defendant-Intervenor State of New Jersey’s Unopposed Motion to Appear on Behalf of the Attorney-In-Charge (the “Motion”) having come before this Court, and the Court having considered the papers submitted in connection with the Motion, and for good cause shown, IT IS HEREBY ORDERED that:

1. The Motion is GRANTED;
2. Jeremy M. Feigenbaum is permitted to appear on behalf of New Jersey at the December 22, 2020 Motion Hearing.

IT IS SO ORDERED on this _____ day of _____, 2020.

Hon. Andrew S. Hanen
United States District Court Judge